

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OF DAVID POPKIN  
(DBP/USPS-140)

The United States Postal Service hereby files its response to the following  
interrogatory of David Popkin: DBP/USPS-140, filed on December 26, 2001.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking

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Michael T. Tidwell  
Attorney

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January 8, 2002

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN

**DBP/USPS-140** Please refer to your response to DBP/USPS-116 subpart d. Your response did not provide the listing of the ADCs that are in the 2-day delivery standard.

**RESPONSE:**

As indicated in response to DBP/USPS-116(d), every single drive time used in the 2 & 3-Day Model has already been provided in an Excel spreadsheet format as part of USPS-LR-1, OCA-12B-1.xls. To assist you further, here is how to determine which ADCs have a 2-Day standard and how to link them to the drive times:

- Go to USPS-LR-1, OCA-12B-1.xls
- Go to the last worksheet titled "Time-Zone corrected Times color".
- Any Origin P&DC to Destinating ADC pair in which is cell is colored RED (drive times up to 12.049) qualified for a 2-Day standard.
- Then refer to USPS LR C2001-3/4, file DFC-USPS-3.xls, to exclude those P&DC-to-ADC pairs which were granted National Exceptions.
- Once you exclude the exceptions, the pairs remaining are those that are 2-Day, from the Parent P&DC
- Please be reminded that offices which are not Parent P&DCs will not reflect drive times in the matrix.
- The current standards are also contained in the previously submitted Service Standards CD-ROM (FY2002 Q1) provided in Response to DBP/USPS-54(a), which can then be compared to the drive times submitted in USPS-LR-1, OCA-12B-1.xls.

## **CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

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